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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

The parties appeared before the Court on February 5, 2019, for a status conference. At that time, a further status was scheduled for March 5, 2019. The government has produced discovery and extended a tentative plea offer. The Defendant at this time anticipates entering an open plea to the charges.

Based on an unanticipated scheduling conflict on behalf of government counsel, the parties request that the March 5, 2019, hearing be continued to March 19, 2019 at 2:30 p.m. The parties agree and jointly request that the time between March 5, 2019, and March 19, 2019, should be excluded in order to provide reasonable time necessary for the continuity and effective preparation of counsel, pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that the ends of justice are served by granting the continuance outweigh the best interests of the public and the defendant in a speedy trial.

**STIPULATION AND PROPOSED ORDER
CASE NO. CR 18-0519 RS**

1 SO STIPULATED:

2 DAVID L. ANDERSON
3 United States Attorney

4 DATED: February 28, 2019

5 _____/s/
6 SAILAJA M. PAIDIPATY
7 Assistant United States Attorneys

8 DATED: February 28, 2019

9 _____/s/
10 DANIEL BLANK
11 Attorney for the Defendant

1 **[PROPOSED] ORDER**

2 Based on the reasons provided in the stipulation of the parties above, the Court hereby FINDS
3 that for adequate preparation of the case by all parties and continuity of counsel, and in the interest of
4 justice, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), an exclusion of time is warranted under the
5 Speedy Trial Act. Based on these findings, IT IS HEREBY ORDERED THAT the hearing is continued
6 until March 19, 2019 at 2:30 p.m., and time is excluded until March 19, 2019.

7
8 DATED: 2/28/19



9 HON. RICHARD SEEBOORG
10 United States District Judge